

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

ORIGINAL

BRUCE ALLEN LILLER, ET AL

Plaintiffs

MJG-02-CV-3390

vs.

ROBERT KAUFFMAN, ET AL

Defendants

The telephone deposition of KRISTI  
WILLIAMS was held on Tuesday, December 2, 2003,  
commencing at 10:00 A.M., at the Law Offices of Lord  
& Whip, 36 South Charles Street, 10th Floor,  
Baltimore, Maryland, 21201, before Trisha G. Rarick,  
a Notary Public.

APPEARANCES:

ARNOLD F. PHILLIPS, ESQUIRE  
(Telephonically)  
On behalf of Plaintiffs

KATHLEEN M. BUSTRAAN, ESQUIRE  
On behalf of Defendants

ALSO PRESENT:

Rita D'Aurora, Risk Manager

REPORTED BY: Trisha G. Rarick

1 Q And what is your occupation?

2 A I'm a psychologist.

3 Q And can you tell me a little bit about your  
4 education? Where did you go to college?

5 A I have a bachelor's degree from West  
6 Virginia University and a master's degree from West  
7 Virginia Graduate College in psychology both.

8 Q When did you graduate from undergraduate?

9 A 1992.

10 Q And when did you graduate from graduate  
11 school?

12 A 1995.

13 Q Is the graduate program in psychology a  
14 three-year program?

15 A I don't think there was a specific time  
16 frame on the program. I completed it in about two and  
17 a half years, but the graduation ceremony didn't occur  
18 until May.

19 Q Were you a full-time grad student or part  
20 time?

21 A Full time.

1 Q Well, I want to know what you think of Mr.  
2 Liller, what are your conclusions, your diagnoses. If  
3 Mr. Phillips calls you to the witness stand and says --  
4 asks you all those questions I just asked you about  
5 your background, and then asks you to testify about Mr.  
6 Liller, what opinions do you intend to offer?

7 A I would basically provide the information  
8 that I have documented in his medical records in terms  
9 of my diagnosis and treatment protocol while I saw him.

10 Q Now, as I understand it, you saw Mr. Liller  
11 for approximately five weeks.

12 A Yes.

13 Q July 1 of 2002 to August 7th of 2002?

14 A Yes.

15 Q Is that correct?

16 A Yes, that's correct.

17 Q Have you seen Mr. Liller since August 7 of  
18 2002?

19 A Not that I recall.

20 Q Can you tell me what you have done to  
21 prepare for today's deposition?

1 A I reviewed my notes and the charts.

2 Q Obviously, we're not sitting face to face  
3 and I don't necessarily want you to tell me every piece  
4 of paper in your chart, but if you could tell me in a  
5 general way what documents are included in your chart,  
6 that would be helpful.

7 A The ones that I reviewed or in the entire  
8 chart?

9 Q First tell me the ones that you reviewed.

10 A I reviewed the CARE program initial  
11 evaluation, the CARE program discharge summary and my  
12 individual daily treatment notes.

13 Q What other materials are included in your  
14 chart?

15 A Physical therapy, occupational therapy and  
16 speech therapy notes. I believe there is some  
17 background information from the acute care hospital  
18 stay. There's a neuropsychological evaluation as well.

19 Q Am I correct that you don't intend to  
20 comment on the physical therapy, occupational therapy,  
21 speech therapy, the hospital stay or any

1 neuropsychological evaluation that was done?

2 A That's correct.

3 Q I have in front of me the discharge  
4 summary. Do you have that?

5 A Do you want me to look at it while you are?

6 Q Yeah, I think it will be helpful if you  
7 follow along so we understand each other.

8 A Okay. Let me find it.

9 Q Sure, take your time.

10 A I have it.

11 Q Okay. You have it in front of you?

12 A Yes.

13 Q Looks to me like you signed the discharge  
14 summary; is that correct?

15 A Yes.

16 Q Did you prepare the discharge summary?

17 A I'm not positive who prepared it.

18 Typically, two or three of us sit down together and do  
19 it, at least two of us. But the ratings are done in a  
20 group when the patient is discharged. And whoever is  
21 available types them in, usually two of us at the same

1 minimum fee.

2 Q Okay. And have you been asked to testify  
3 at trial of this case, assuming that the case is tried?

4 A Have I been asked?

5 Q Yes.

6 A No.

7 Q If you are asked, do you intend to respond  
8 and testify?

9 A Yes.

10 Q In other words, if you're asked to testify  
11 at trial, you're willing to do that?

12 A Yes.

13 Q Is there any additional information that  
14 you think you need to help you testify in this case or  
15 any issues that you think you need additional  
16 information to evaluate?

17 A Not if I'm testifying on behalf of my  
18 treatment and where he was at the time of discharge.

19 MS. BUSTRAAN: Okay. Well, I appreciate  
20 that. I think that's all the questions I have. Mr.  
21 Phillips may have questions, I don't know.